

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR A CRIMINAL COMPLAINT AND
ARREST WARRANT**

I, Cory P. McManus, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION

1. I make this affidavit in support of an application for a criminal complaint charging JASON WEDDERBURN (DOB [REDACTED] 1980) and KAYAN KITSON (DOB [REDACTED] 1983) with Mail Fraud in violation of 18 U.S.C. § 1341, Money Laundering in violation of 18 U.S.C. § 1956, Conspiracy in violation of 18 U.S.C. § 371, and the Senior Citizens Against Marketing Scams Act of 1994 (“SCAMS Act”) in violation of 18 U.S.C. § 2326.
2. The facts set forth in the Affidavit are based on my personal observations, my training and experience, information obtained from other agents, witnesses, and records obtained during the course of the investigation. Because I submit this Affidavit for the limited purpose of showing probable cause, I have not included in this Affidavit each and every fact that I have learned in this investigation. Rather, I have set forth only facts sufficient to establish probable cause to issue an arrest warrant for the individuals identified herein and to search the email accounts set forth herein. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

II. AFFIANT BACKGROUND

3. I have been a law enforcement officer for over 16 years and have been a United States Postal Inspector since July 2017. I am currently assigned to the Providence, Rhode Island field office of the United States Postal Inspection Service and I am responsible for the investigation of various crimes relating to the United States Mail including, but not limited to mail fraud, bank fraud, identity theft, and mail theft. Prior to my appointment as a Postal Inspector, I was a Special Agent with the United States Secret Service for approximately 13 years. I have received training in conducting investigations of crimes

that adversely affect, or fraudulently use, the United States Mail and the United States Postal Service (USPS). I have participated in criminal investigations of various violations of Title 18 of the United States Code involving financial crimes, including mail, bank, and wire fraud, identity theft, money laundering, and computer crimes. In the course of my employment I have received training and have been involved in the use of investigative techniques such as interviewing victims, informants, and witnesses, conducting physical surveillance, and analyzing financial records. I have participated in and executed several search and arrest warrants.

III. PROBABLE CAUSE

4. Based on my training and experience, I have become familiar with “Jamaican lottery scams”. Lottery scams often originate out of Jamaica and target United States residents. Commonly, the scammers lead victims to believe they have won a lottery, but the cash or prizes will not be released without upfront payment of taxes or fees. Scammers frequently target the elderly, under-educated or those with disposable incomes. In a so-called Jamaican lottery scam, an individual in the United States receives an unsolicited telephone call from an individual in Jamaica claiming to work for a well-known organization, such as Publishers Clearing House. The scammer notifies them that they have won large cash prizes, vacation getaways, vehicles, or other prizes. However, in order to collect their winnings, the individual is instructed to send money to pay for processing fees or taxes on their winnings. The scammer typically assures people that they will receive their prize shortly after the lottery has received their payment. Following these instructions, victims immediately mail or wire the money, but never receive their purported winnings.
5. On June 21, 2019, [REDACTED] filed a complaint with the Rehoboth (MA) Police Department on behalf of her father, [REDACTED] year of birth 1940. According to the police report, Mr. [REDACTED] was contacted by an individual named “Roger Black” who informed him that he had won \$1.5 million. However, Mr. [REDACTED] was informed he had to pay the taxes before claiming his winnings by sending money to WEDDERBURN, KITSON and various other individuals.

6. As a result, between October 2018 and June 2019, Mr. [REDACTED] was fraudulently induced to mail a total of \$325,716.00 to various individuals throughout the United States, including WEDDERBURN and KITSON. Mr. [REDACTED] sent packages¹ containing cash, checks, gift cards and cell phones at the direction of “Roger Black” and other participants in the scheme. Of the \$325,716.00 Mr. [REDACTED] sent, \$106,100.00 was sent to WEDDERBURN and KITSON via sixteen (16) cashier’s checks in various denominations. As instructed, all sixteen cashier’s checks were made payable to WEDDERBURN or KITSON and mailed to their respective addresses or deposited directly² into their accounts by Mr. [REDACTED]

DATE	AMOUNT	VICTIM	VICTIM'S BANK	PAYMENT METHOD	PAYEE	BANK ³	ADDRESS	CITY/STATE
30-Nov-2018	\$ 7,000.00	[REDACTED]	BCSB	CASHIERS CHECK	JASON WEDDERBURN	TD BANK	600 MERRIMON AVE, 25G	ASHEVILLE NC
4-Dec-2018	\$ 7,000.00	[REDACTED]	BCSB	CASHIERS CHECK	JASON WEDDERBURN	TD BANK	600 MERRIMON AVE, 25G	ASHEVILLE NC
21-Dec-2018	\$ 8,500.00	[REDACTED]	BCSB	CASHIERS CHECK	JASON WEDDERBURN	TD BANK	600 MERRIMON AVE, 25G	ASHEVILLE NC
25-Jan-2019	\$ 8,000.00	[REDACTED]	BCSB	CASHIERS CHECK	JASON WEDDERBURN	TD BANK	600 MERRIMON AVE, 25G	ASHEVILLE NC
5-Feb-2019	\$ 8,000.00	[REDACTED]	BCSB	CASHIERS CHECK	JASON WEDDERBURN	TD BANK	600 MERRIMON AVE, 25G	ASHEVILLE NC
24-May-2019	\$ 3,500.00	[REDACTED]	BCSB	CASHIERS CHECK	JASON WEDDERBURN	TD BANK	600 MERRIMON AVE, 25G	ASHEVILLE NC
24-May-2019	\$ 3,500.00	[REDACTED]	BOA	CASHIERS CHECK	JASON WEDDERBURN	TD BANK	600 MERRIMON AVE, 25G	ASHEVILLE NC
30-Nov-2018	\$ 7,000.00	[REDACTED]	BCSB	CASHIERS CHECK	KAYAN KITSON	TD BANK	2916 CRESTON AVE	BRONX NY
4-Dec-2018	\$ 7,000.00	[REDACTED]	BCSB	CASHIERS CHECK	KAYAN KITSON	TD BANK	2916 CRESTON AVE	BRONX NY
21-Dec-2018	\$ 8,500.00	[REDACTED]	BCSB	CASHIERS CHECK	KAYAN KITSON	TD BANK	2916 CRESTON AVE	BRONX NY
25-Jan-2019	\$ 8,000.00	[REDACTED]	BCSB	CASHIERS CHECK	KAYAN KITSON	TD BANK	2916 CRESTON AVE	BRONX NY
5-Feb-2019	\$ 8,000.00	[REDACTED]	BCSB	CASHIERS CHECK	KAYAN KITSON	TD BANK	2916 CRESTON AVE	BRONX NY
26-Feb-2019	\$ 6,500.00	[REDACTED]	BCSB	CASHIERS CHECK	KAYAN KITSON	TD BANK	2916 CRESTON AVE	BRONX NY
26-Apr-2019	\$ 5,000.00	[REDACTED]	BOA	CASHIERS CHECK	KAYAN KITSON	TD BANK	2916 CRESTON AVE	BRONX NY
3-May-2019	\$ 5,000.00	[REDACTED]	BOA	CASHIERS CHECK	KAYAN KITSON	TD BANK	2916 CRESTON AVE	BRONX NY
7-Jun-2019	\$ 5,600.00	[REDACTED]	BOA	CASHIERS CHECK	KAYAN KITSON	TD BANK	2916 CRESTON AVE	BRONX NY

BCSB = BRISTOL COUNTY SAVINGS BANK
BOA = BANK OF AMERICA

¹ Any and all mail originating from 02769 (Rehoboth, MA) is processed at the USPS Providence, RI Processing & Distribution Center before being forwarded to its intended destination.

² Mr. [REDACTED] utilized TD Branch locations in East Providence (RI) and North Attleboro (MA) to direct deposit money into subject accounts.

³ The TD Bank accounts referenced in this chart are the accounts opened by WEDDERBURN and KITSON and described in paragraphs 20 and 35.

7. Eventually Mr. [REDACTED]'s children, including [REDACTED] learned that their father had been defrauded and reported the matter to the Rehoboth Police Department. After the [REDACTED] family reported the matter to law enforcement, I requested grand jury subpoenas to be served on various banks in connection with the investigation. Once bank records (First Citizens FCU, Bristol County Savings Bank and Bank of America) from which Mr. [REDACTED] sent money to WEDDERBURN, KITSON and others were analyzed, I was able to identify accounts used by WEDDERBURN, KITSON and other members of the conspiracy. Upon analysis of these accounts I was able to identify additional potential victims who also sent money to WEDDERBURN, KITSON and others conspirators.
8. During this investigation, I identified 11 individuals who received funds from victims of the lottery scam. I also identified 89 individuals, to include Mr. [REDACTED] throughout the United States who sent more than \$600,000.00 to WEDDERBURN, KITSON and others from approximately May 2015 through May 2020. Funds received by WEDDERBURN and KITSON from victims were sent via money orders, money transfers, personal and cashier's checks, cash or directly deposited into their accounts. Based upon my review of bank records, money transfers and interviews, I determined that at least ten (10) of the individuals who sent money to WEDDERBURN and KITSON in this manner were over the age of 55.
9. Various law enforcement entities assisted with contacting victims throughout the United States. All of the victims interviewed stated that they were initially contacted via telephone by scammers and told they were entitled to claim a large amount of money in a lottery. Additionally, the victims said they were instructed to send money to WEDDERBURN and KITSON in advance of receiving their purported winnings. The victims were told the money they were directed to send was for the payment of taxes or processing fees on their winnings. Below is a summary of the interviews conducted.
10. On August 12, 2019, Special Agent Timothy Ball (FBI) interviewed [REDACTED] (YOB 1933), a resident of Eveleth, MN. Ms. [REDACTED] stated she had been contacted, via telephone, approximately 3 years ago by an individual who identified himself as "Michael McKay". Ms. [REDACTED] stated "McKay" informed her she had won the International Mega Millions Sweepstakes but was required to pay upfront fees in order to

collect her winnings. Ms. [REDACTED] believes since May 2018, she has lost over \$200,000 to this scam. Bank records revealed between May 2018 and October 2018, Ms. [REDACTED] sent two money orders and eight personal checks totaling \$26,450 to WEDDERBURN and KITSON:

DATE	AMOUNT	VICTIM	VICTIM'S BANK	METHOD OF PAYMENT	PAYEE	BANK	ACCOUNT #
10-May-2018	\$1,000.00	[REDACTED]	USPS	MONEY ORDER	KAYAN KITSON	TD BANK	4356086045
10-May-2018	\$350.00	[REDACTED]	USPS	MONEY ORDER	KAYAN KITSON	TD BANK	4356086045
1-Jun-2018	\$1,500.00	[REDACTED]	BANK OF AMERICA	CHECK	KAYAN KITSON	TD BANK	4356086045
3-Jul-2018	\$700.00	[REDACTED]	FRANDSEN BANK	CHECK	KAYAN KITSON	TD BANK	4356086045
21-Jul-2018	\$700.00	[REDACTED]	FRANDSEN BANK	CHECK	KAYAN KITSON	TD BANK	4356086045
1-Aug-2018	\$1,500.00	[REDACTED]	BANK OF AMERICA	CHECK	KAYAN KITSON	TD BANK	4356086045
12-Oct-2018	\$8,250.00	[REDACTED]	WELLS FARGO	CHECK	JASON WEDDERBURN	BANK OF AMERICA	237038549555
5-Oct-2018	\$8,950.00	[REDACTED]	WELLS FARGO	CHECK	JASON WEDDERBURN	TD BANK	4358153404
15-Oct-2018	\$2,000.00	[REDACTED]	WELLS FARGO	CHECK	JASON WEDDERBURN	TD BANK	4358153404
23-Oct-2018	\$1,500.00	[REDACTED]	WELLS FARGO	CHECK	JASON WEDDERBURN	TD BANK	4358153404

11. On May 8, 2020, I interviewed [REDACTED] (YOB 1948), a resident of Westfield, MA. Ms. [REDACTED] stated she had been contacted, via telephone, in July of 2018 by an individual who identified himself as "John Baker" from the unclaimed prize department. Ms. [REDACTED] stated "Baker" informed her she had won \$1.5 million in a lottery but was required to pay upfront fees in order to collect her winnings. Ms. [REDACTED] stated since July 2018, she has lost over \$108,000 to this scam. Bank records and receipts provided by Ms. [REDACTED] revealed in February 2019, Ms. [REDACTED] direct deposited⁴ two treasurers checks totaling \$12,000 to WEDDERBURN and KITSON:

DATE	AMOUNT	VICTIM	VICTIM'S BANK	METHOD OF PAYMENT	PAYEE	BANK	ACCOUNT #
14-Feb-2019	\$7,000.00	[REDACTED]	UNITED BANK	TREASURERS CHECK	JASON WEDDERBURN	BANK OF AMERICA	237038549555
4-Feb-2019	\$5,000.00	[REDACTED]	UNITED BANK	TREASURERS CHECK	KAYAN KITSON	TD BANK	4356086045

12. On May 21, 2020, I interviewed Chief William Ulwick of the Ashland (NH) Police Department regarding [REDACTED] an 81 year-old citizen in his community. Chief Ulwick stated he was aware of Ms. [REDACTED] and that she has been victimized by several

⁴ Ms. [REDACTED] utilized TD Branch and Bank of America locations in Holyoke (MA) and Westfield (MA) to direct deposit money into subject accounts.

scams over the last few years. Chief Ulwick stated that Ms. [REDACTED]'s children were concerned about their mother's well-being and asked law enforcement to intervene. Chief Ulwick stated, at first, Ms. [REDACTED] was adamant that she had won a new vehicle, but after multiple conversations over the years, she has begun to realize that she is being scammed. Due to Ms. [REDACTED]'s inability to stop falling for these scams and the financial strains she is now facing, Chief Ulwick referred her to the NH Bureau of Elderly and Adult Services. Bank records revealed between May 2018 and July 2019, Ms. [REDACTED] deposited cash on three occasions⁵, totaling \$5,200.00 into KITSON's bank account:

DATE	AMOUNT	VICTIM	METHOD OF PAYMENT	PAYEE	BANK	ACCOUNT #
22-May-2018	\$3,000.00	[REDACTED]	CASH	KAYAN KITSON	TD BANK	4356086045
5-Jun-2019	\$1,700.00	[REDACTED]	CASH	KAYAN KITSON	TD BANK	4356086045
3-Jul-2019	\$500.00	[REDACTED]	CASH	KAYAN KITSON	TD BANK	4356086045

13. On June 12, 2020, I interviewed Dave McKinzie, an investigator with Citizens Bank, regarding Citizens Bank customer [REDACTED] (YOB 1933). Investigator McKinzie stated he contacted Ms. [REDACTED] after three official checks drawn on her account were deposited into WEDDERBURN's TD Bank account. Ms. [REDACTED] stated she had been contacted, via telephone, by an individual who identified himself as "Gillespie" from the Treasury Department. Ms. [REDACTED] stated "Gillespie" informed her she had won \$36 million but was required to pay upfront fees in order to collect her winnings. Investigator McKinzie contacted TD Bank to attempt to recover the funds but was informed the funds were already withdrawn through debit card transactions in Jamaica. Bank records revealed between February 2020 and May 2020, Ms. [REDACTED] deposited four official checks, totaling \$59,500.00 into WEDDERBURN's bank accounts:

DATE	AMOUNT	VICTIM	METHOD OF PAYMENT	PAYEE	BANK	ACCOUNT #
11-May-2020	\$19,800.00	[REDACTED]	OFFICIAL CHECK	JASON WEDDERBURN	TD BANK	4358153404
12-Feb-2020	\$10,000.00	[REDACTED]	OFFICIAL CHECK	JASON WEDDERBURN	TD BANK	4358153404
17-Apr-2020	\$9,700.00	[REDACTED]	OFFICIAL CHECK	JASON WEDDERBURN	TD BANK	4358153404
17-Jan-2020	\$20,000.00	[REDACTED]	OFFICIAL CHECK	JASON WEDDERBURN	REGIONS BANK	290287975

⁵ An Elder Exploitation/Neglect Report was filed by TD Bank (Branch 1360 / Bristol, NH) on 10/28/2019 regarding Ms. [REDACTED]'s unusual cash deposits into various bank accounts.

14. On July 7, 2020, I interviewed Detective Mike Bellanca of the Pelham (AL) Police Department regarding [REDACTED] a 75 year-old citizen in his community. Detective Bellanca stated Ms. [REDACTED] had been contacted, via telephone and email, by an individual who identified himself as “John Baker” from Mega Millions of Nevada. Ms. [REDACTED] stated “Baker” informed her she had won \$7 million in a lottery but was required to pay upfront fees in order to collect her winnings. Ms. [REDACTED] stated since April of 2020, she has lost over \$74,900 to this scam. Bank records revealed between April 2020 and May 2020, Ms. [REDACTED] deposited three checks, totaling \$17,000.00 into WEDDERBURN’s bank account:

DATE	AMOUNT	VICTIM	METHOD OF PAYMENT	PAYEE	BANK	ACCOUNT #
3-Apr-2020	\$5,500.00	[REDACTED]	PERSONAL CHECK	JASON WEDDERBURN	REGIONS BANK	290287975
6-May-2020	\$5,750.00	[REDACTED]	OFFICIAL CHECK	JASON WEDDERBURN	REGIONS BANK	290287975
14-May-2020	\$5,750.00	[REDACTED]	CASHIERS CHECK	JASON WEDDERBURN	REGIONS BANK	290287975

IV. BANK ACCOUNT INFORMATION

WEDDERBURN’s BANK OF AMERICA ACCOUNT ENDING IN #9555

15. WEDDERBURN opened Bank of America Checking Account #237038549555 on May 8, 2018. The account was held in his name with an address of 600 Merrimon Ave, Apt 25G, Asheville, NC. According to account opening documents, WEDDERBURN provided a Jamaica passport (A3913867) as identification. This account was closed ten months later by Bank of America on March 7, 2019.
16. Investigators reviewed account records for the period of May 2018 through March 2019. Among the documents reviewed were opening documents, bank statements, canceled checks, deposit tickets, and items deposited.
17. This account appeared to be used almost entirely for the laundering of fraudulent proceeds before it was closed. Between May 2018 and March 2019, \$168,151.41 was deposited into the account. Most of the funds deposited into this account are suspected to be fraudulent with the exception of deposits from Omni Hotels and certain miscellaneous, unknown counter credits⁶. \$113,000.00 of the funds deposited into this account are the

⁶ From the bank statements provided, investigators are unable to identify which, if any, deposits are cash deposits.

result of checks or money orders from various individuals across the United States, including some of whom have been confirmed to be victims.

18. A review of activity on the account revealed between May 2018 and January 2019, there were 17 direct deposits by Omni Hotel Ltd.⁷ totaling \$10,160.45, consistent with legal employment.
19. A review of activity on the account revealed between January 2019 and February 2019, there were 73 international ATM withdrawals ranging from \$480.00 to \$505.00 totaling \$35,860.00. There were instances of rapid movements of funds involving domestic check deposits followed by international ATM withdrawals on the same day and/or the next several days. A sampling of the transactions is as follows:

DATE	AMOUNT	TRANSACTION	STATE	COUNTRY	TRANSACTION DETAILS
2/14/19	\$7000.00	CHECK DEPOSIT from Victim Mayo	MASSACHUSETTS	UNITED STATES	LINCOLN ST BRANCH
2/14/19	\$500.00	ATM CASH WITHDRAWAL		JAMAICA	BNS HALF MOON
2/14/19	\$480.00	ATM CASH WITHDRAWAL		JAMAICA	BNS HALF MOON
2/15/19	\$500.00	ATM CASH WITHDRAWAL		JAMAICA	BNS HALF MOON
2/15/19	\$480.00	ATM CASH WITHDRAWAL		JAMAICA	BNS HALF MOON
2/16/19	\$500.00	ATM CASH WITHDRAWAL		JAMAICA	BNS HALF MOON
2/16/19	\$480.00	ATM CASH WITHDRAWAL		JAMAICA	BNS HALF MOON
2/17/19	\$500.00	ATM CASH WITHDRAWAL		JAMAICA	BNS SHOP #2 IRONSHORE
2/17/19	\$480.00	ATM CASH WITHDRAWAL		JAMAICA	BNS SHOP #2 IRONSHORE

WEDDERBURN's TD BANK ACCOUNT ENDING IN #3404

20. WEDDERBURN opened TD Bank Checking Account #4358153404 on August 24, 2018. The account was held in his name with an address of 600 Merrimon Ave, Apt 25G, Asheville, NC. According to account opening documents, WEDDERBURN provided a Jamaican passport (A3913867) and Jamaican driver's license (117919217) as identification. This account was closed twenty-one months later by TD Bank on May 14, 2020.
21. Investigators reviewed account records for the period of August 2018 through May 2020. Among the documents reviewed were opening documents, bank statements, canceled checks, deposit tickets, and items deposited.
22. This account also appeared to be used almost entirely for the laundering of fraudulent proceeds. Between August 2018 and May 2020, \$311,818.00 was deposited into the

⁷ There is an Omni Hotel located in Asheville, NC. See <https://www.omnihotels.com/hotels/asheville-grove-park>.

account. There were deposits of personal and cashier's checks totaling \$136,150.00 that were from various individuals across the United States, including some of whom have been confirmed to be victims, including Mr. [REDACTED], Ms. [REDACTED] and Ms. [REDACTED]. Additionally, between November 2018 and May 2020, there were cash deposits totaling approximately \$139,171.99 made at various TD Bank branches in the United States. In my review of the account records, I could detect no legitimate business or employment reason for such large cash deposits. There was no other deposit activity in this account prior to its closure by the bank.

23. A review of activity on the account revealed between October 2018 and May 2020, there were 353 international ATM withdrawals ranging from \$65.00 to \$505.00 totaling \$162,112.67. There were multiple instances of a rapid movement of funds involving domestic cash deposits followed by international ATM withdrawals on the same day and next day. A sampling of the transactions is as follows:

DATE	AMOUNT	TRANSACTION	STATE	COUNTRY	TRANSACTION DETAILS
11/13/18	\$900.00	CASH DEPOSIT	NORTH CAROLINA	UNITED STATES	BRANCH #0400
11/13/18	\$505.00	ATM CASH WITHDRAWAL		JAMAICA	BNS SHOP #2 IRONSHORE
11/13/18	\$245.00	ATM CASH WITHDRAWAL		JAMAICA	BNS SHOP #2 IRONSHORE
12/3/18	\$505.00	ATM CASH WITHDRAWAL		JAMAICA	AGE ROSE HALL
12/3/18	\$245.00	ATM CASH WITHDRAWAL		JAMAICA	AGE ROSE HALL
12/4/18	\$7000.00	CHECK DEPOSIT	RHODE ISLAND	UNITED STATES	BRANCH #0695
12/4/18	\$505.00	ATM CASH WITHDRAWAL		JAMAICA	AGE ROSE HALL
12/4/18	\$245.00	ATM CASH WITHDRAWAL		JAMAICA	AGE ROSE HALL
6/14/19	\$4000.00	CASH DEPOSIT	NORTH CAROLINA	UNITED STATES	BRANCH #3999
6/14/19	\$385.00	ATM CASH WITHDRAWAL		JAMAICA	BNS SHOP #2 IRONSHORE

24. Other activities within the account consisted of debits for Uber, supermarkets, fast food companies, bank fees and the prepaid mobile phone company Digicel¹⁰.

WEDDERBURN WELLS FARGO ACCOUNT ENDING IN #5854

25. WEDDERBURN opened Wells Fargo Checking Account # 6084515854 on December 28, 2018. The account was held in his name with an address of 600 Merrimon Ave, Apt 25G, Asheville, NC. According to account opening documents,

⁸ All but one check (200006740 dep. in Asheville, NC) was deposited directly by Mr. [REDACTED] at TD Bank branches in East Providence, RI and North Attleboro, MA into WEDDERBURNS TD Bank Account.

⁹ Ms. [REDACTED]'s checks made payable to WEDDERBURN were negotiated at TD Bank Branch 6508 – Grand Concourse (NY) – the same branch location KITSON used for transactions associated with her TD Bank Account.

¹⁰ Digicel is a Caribbean mobile phone network provider headquartered in Jamaica.

WEDDERBURN provided a North Carolina driver's license (43226456) as identification and listed the Omni Grove Park Hotel as his employer. This account was closed nine months later by Wells Fargo on September 25, 2019.

26. This account also appeared to be used almost entirely for the laundering of fraudulent proceeds. Between December 2018 and September 2019, \$32,528.52 was deposited into the account. Between May 2019 and September 2019, \$19,725.00 in checks and money orders made payable to WEDDERBURN from various individuals were deposited into the account. The remaining deposit activity includes unexplained cash deposits and \$5,426.58 of which appears to be the result of legal employment with Omni Grove Park Hotel.
27. A review of activity on the account revealed between June 2019 and September 2019, there were 36 domestic and international ATM withdrawals ranging from \$7.00 to \$6,000.00 totaling \$20,738.00. There were multiple instances of rapid movements of funds involving domestic check or money order deposits followed by ATM withdrawals on the same day and/or the next day consistent with the activity observed in WEDDERBURN's other accounts.

WEDDERBURN REGIONS BANK ACCOUNT ENDING IN #7975

28. WEDDERBURN opened Regions Bank Account # 0290287975 on January 8, 2020. The account was held in his name with an address of 3013 Midland Pl, Miramar, FL. According to account opening documents, WEDDERBURN provided a Jamaican passport (A3913867) and Jamaican driver's license (117919217) as identification. Due to fraudulent activity consistent with a romance scam, this account was frozen by Regions Bank on May 18, 2020.
29. On July 6, 2020, I spoke with Regions Bank Investigator Tammy Beuer regarding the status of Region Bank Account # 0290287975. Investigator Beuer stated that WEDDERBURN had called the Regions Bank branch in Daytona, FL several times attempting to gain access to funds frozen in his account.
30. On July 10, 2020, a seizure warrant (1:20SW223LDA) was signed by Judge Lincoln Almond in the District of Rhode Island authorizing the seizure of funds in Regions Bank Account # 0290287975. Funds in the amount of \$10,975.76 were seized pursuant to this order.

31. Investigators reviewed account records for the period January 2020 through May 2020. Among the documents reviewed were opening documents, bank statements, canceled checks, deposit tickets, and items deposited.
32. This account appeared to be used almost entirely for the laundering of fraudulent proceeds. Between January 2020 and May 2020, \$77,602.76 was deposited into the account, \$39,060.00 of which were checks and money orders made payable to WEDDERBURN from suspected victims, including Ms. [REDACTED] and Ms. [REDACTED]. Additionally, between January 2020 and May 2020, there were unexplained cash deposits totaling approximately \$38,530.00 made at the Regions Bank Daytona Beach branch in the United States. There was no other deposit activity in this account prior to it being frozen by the bank.
33. A review of activity on the account revealed between February 2020 and May 2020, there were 192 international ATM withdrawals ranging from \$75.20 to \$505.00 totaling \$61,782.36. There were multiple instances of rapid movements of funds involving domestic check or money order deposits followed by ATM withdrawals on the same day and/or the next day. A sampling of the transactions is as follows:

DATE	AMOUNT	TRANSACTION	STATE	COUNTRY	TRANSACTION DETAILS
2/24/20	\$4,000.00	CASH DEPOSIT	FLORIDA	UNITED STATES	CORSAIR DR, DAYTONA BEACH
2/24/20	\$505.00	ATM CASH WITHDRAWAL		JAMAICA	IRONSHORE ST. JAMES
2/24/20	\$205.00	ATM CASH WITHDRAWAL		JAMAICA	IRONSHORE ST. JAMES
2/24/20	\$505.00	ATM CASH WITHDRAWAL		JAMAICA	IRONSHORE ST. JAMES
2/24/20	\$205.00	ATM CASH WITHDRAWAL		JAMAICA	IRONSHORE ST. JAMES
2/24/20	\$505.00	ATM CASH WITHDRAWAL		JAMAICA	IRONSHORE ST. JAMES
2/24/20	\$205.00	ATM CASH WITHDRAWAL		JAMAICA	IRONSHORE ST. JAMES

KITSON TD BANK ACCOUNT ENDING IN #6045

34. KITSON opened TD Bank Checking Account #4356086045 on May 7, 2018. The account was held in her name with an address of 2415 Creston Ave, Apt 35, Bronx, NY. According to account opening documents, KITSON provided a Jamaican passport (3847324) and US Visa (20152667160002) as identification. Due to fraudulent activity, TD Bank informed KITSON via telephone that her account was being closed and she was no longer permitted to maintain any relationships with TD Bank. Eighteen months after this account was opened it was closed by TD Bank on November 8, 2019.

35. Investigators reviewed account records for the period May 2018 through November 2019. Among the documents reviewed were opening documents, bank statements, canceled checks, deposit tickets, and items deposited.
36. This account appeared to be used almost entirely for the laundering of fraudulent proceeds. Between May 2018 and November 2019, \$259,146.93 was deposited into the account, \$95,575.00 of which is from the deposit of checks and money orders from other individuals some of who have been interviewed and identified as victims, including Mr. [REDACTED]¹¹, Ms. [REDACTED] and Ms. [REDACTED]. Between May 2018 and October 2019, there were unexplained cash deposits into the account totaling approximately \$142,531.66. These deposits were made at various TD Bank branches in the United States. Based on my review of the account, there was no legitimate reason for such large amounts of cash deposits. Also, I know that Ms. [REDACTED] the victim referenced in paragraph 12, deposited \$5,200 into KITSON's TD Bank Acct. # 6045, as did WEDDERBURN, as described below. There was no other deposit activity in this account prior to its closure by the bank. Based upon all of the above, I believe that nearly all of the funds deposited into KITSON's TD Bank Acct. # 6045 were fraudulent, and that the account was used by her to launder these fraudulent proceeds.
37. A review of activity on the account revealed between June 2018 and August 2019, there were 587 international ATM withdrawals and debit card purchases ranging from \$4.35 to \$605.00 totaling \$199,212.89. There were multiple instances of rapid movements of funds involving domestic check, cash and money order deposits followed by ATM withdrawals on the same day and/or the next day. A sampling of the transactions is as follows:

DATE	AMOUNT	TRANSACTION	STATE	COUNTRY	TRANSACTION DETAILS
10/2/18	\$505.00	ATM CASH WITHDRAWAL		JAMAICA	BNS SHOP #2 IRONSHORE
10/2/18	\$245.00	ATM CASH WITHDRAWAL		JAMAICA	BNS SHOP #2 IRONSHORE
10/3/18	\$500.00	CASH DEPOSIT	NEW YORK	UNITED STATES	GRAND CONCOURSE 6508
10/3/18	\$245.00	ATM CASH WITHDRAWAL		JAMAICA	AGE ROSE HALL
10/3/18	\$505.00	ATM CASH WITHDRAWAL		JAMAICA	AGE ROSE HALL
7/22/19	\$1000.00	CASH DEPOSIT	NEW YORK	UNITED STATES	GRAND CONCOURSE 6508
7/22/19	\$565.00	ATM CASH WITHDRAWAL		JAMAICA	BNS SHOP #2 IRONSHORE
7/22/19	\$545.00	ATM CASH WITHDRAWAL		JAMAICA	BNS SHOP #2 IRONSHORE

¹¹ All but one check (200006739 dep. in Asheville, NC) was deposited directly by Mr. [REDACTED] at TD Bank branches in East Providence, RI and North Attleboro, MA into KITSON's TD Bank Account.

38. Other activities within the account consist of debits for Apple iTunes, supermarkets, fast food companies, bank fees and the prepaid mobile phone company Digicel.
39. According to TD Bank records, KITSON had two foreign travel notices on file for the country of Jamaica. The foreign travel date ranges found during this review are for the time periods of 6/18/2018 – 8/20/2018 and 8/3/2018 – 10/31/2018.
40. On July 25, 2020, KITSON arrived in Miami from Jamaica, via American Airlines flight 869. During a screening by Customs and Border Protection (CBP) Officers, KITSON was found to be travelling with \$20 cash, no credit or debit cards and a phone that contained limited information. KITSON stated to CBP Officers that she was helping out her friend, [REDACTED]², who was having breast augmentation surgery. KITSON also stated that she would be heading back to Jamaica on Friday, July 31, 2020. The Officer who oversaw the screening of KITSON stated that someone travelling from overseas with such limited belongings was not normal. Additionally, the Officer stated that KITSON is either smart and knew she'd be screened at the airport or has a handler in Jamaica instructing her on how to travel back into the United States.

V. MOVEMENT OF FUNDS BETWEEN CO-CONSPIRATORS

41. Between November 2018 and May 2019, sixteen peer-to-peer¹³ (P2P) transfers were made from TD Bank Account 4358153404 (WEDDERBURN) into TD Bank Account 4356086045 (KITSON), ranging from \$100.00 to \$2,500.00 totaling \$14,600.00.
42. Between July 2018 and August 2018, nine Zelle¹⁴ transfers were made from Bank of America Account 237038549555 (WEDDERBURN) into TD Bank Account 4356086045 (KITSON), ranging from \$70.00 to \$1,150.00 totaling \$5,890.00.

¹² [REDACTED] is also a target of this investigation having received funds from victims, to include Mr. [REDACTED] and Ms. [REDACTED] into her TD Bank account.

¹³ Person-to-person payments (P2P) is an online technology that allows customers to transfer funds from their bank account or credit card to another individual's account via the Internet or a mobile phone.

¹⁴ Zelle is a payment service enables individuals to electronically transfer money from their bank account to another registered user's bank account (within the United States) using a mobile device or the website of a participating banking institution.

43. Between August 2018 and September 2018, there were three cash withdrawals from TD Bank Account 4358153404 (WEDDERBURN) totaling \$15,000. On the same dates, there were three cash deposits into TD Bank Account 4356086045 (KITSON) as detailed below:

- On 8/30/18 at 1:20PM, there was a \$6,000.00 cash withdrawal from WEDDERBURN's TD Bank Account 4358153404 in Asheville, NC. That same day at 1:21PM, there was a \$6,000.00 cash deposit into KITSON's TD Bank Account 4356086045 in Asheville, NC.
- On 9/4/18 at 4:30PM, there was a \$5,000.00 cash withdrawal from WEDDERBURN's TD Bank Account 4358153404 in Asheville, NC. That same day at 4:31PM, there was a \$5,000.00 cash deposit into KITSON's TD Bank Account 4356086045 in Asheville, NC.
- On 9/10/18 at 8:41AM, there was a \$4,000.00 cash withdrawal from WEDDERBURN's TD Bank Account 4358153404 in Asheville, NC. That same day at 8:42AM, there was a \$4,000.00 cash deposit into KITSON's TD Bank Account 4356086045 in Asheville, NC.

VI. SUMMARY OF DEFENDANT INVOLVEMENT

44. As described herein, from May 2018 through May 2020, JASON WEDDERBURN received approximately \$307,935.00 from various victims, both known and unknown, throughout the United States. These funds were deposited into four different accounts opened and maintained by WEDDERBURN.

45. In addition, between November 2018 and May 2020, there were cash deposits totaling approximately \$177,701.99 made at various TD Bank branches in the United States into WEDDERBURN's TD Bank Account (4358153404) and at the Regions Bank Daytona Beach branch into WEDDERBURN's Regions Bank Account (290287975).

46. As described herein, from May 2018 through October 2019, KAYAN KITSON received approximately \$100,775.00 from various victims, both known and unknown, throughout the United States. These funds were deposited into one account opened and maintained by KITSON.

47. In addition, between May 2018 and October 2019, there were unexplained cash deposits totaling approximately \$142,531.66 made at various TD branches in the United States into KITSON's TD Bank Account (4356086045).
48. Three of the victims identified in this investigation, Mr. [REDACTED] Ms. [REDACTED] and Ms. [REDACTED] sent funds to both WEDDERBURN and KITSON.
49. As described herein, between July 2018 and May 2019, KITSON received approximately \$35,490 from WEDDERBURN via various methods of transfer.
50. As described herein, direct deposits related to legal employment totaled \$15,587.03 for WEDDERBURN. Bank records for KITSON did not reveal any type of employment.
51. With the exception of the \$15,587.03 described above, there did not appear to be any source of legitimate income into WEDDERBURN's or KITSON's accounts. Further, the known victim funds deposited into the account, as well as the character of the other deposits, lead me to conclude that these account were used for the collection of fraudulent proceeds here in the United States. Once collected, the fraudulent proceeds were (1) transferred to Jamaica through ATM withdrawals at various locations in that country; (2) converted to cash; or (3) transferred amongst conspirators.
52. Based upon my training and experience, I know that the use of "funnel" accounts, that is, accounts into which fraudulent proceeds are deposited in one location and withdrawn in another location is a common method of laundering funds, including to conceal the nature, source, location, ownership and control of the fraudulent proceeds. I also know that cash transactions are another method employed to conceal the proceeds of criminal activity. I know based upon my training and experience that multiple, unexplained wire transfers and cash withdrawals following the receipt of criminal proceeds can be a method of dispersing criminally acquired funds that confounds investigators' ability to trace those funds to their source.

VII. CONCLUSION

53. From my training and experience, I am aware that the Jamaican lottery scheme described above is extremely widespread. According to records maintained by the Postal Inspection Service, this scheme and similar schemes have affected thousands of victims

in the United States. These victims reside throughout the United States and are often elderly, under-educated or those with disposable incomes. In my training and experience and based upon my review of the records in this case, it is likely that the same individuals who victimized the aforementioned individuals have victimized other individuals using the same or similar scheme resulting in the unexplained cash deposits and/or deposits of unknown money orders or checks described above.

54. Furthermore, I know that individuals who amass proceeds from illegal activities routinely attempt to further that conduct and/or conceal the existence and source of their funds by engaging in financial transactions with domestic and foreign institutions, and others, through all manner of financial instruments, including cash, cashier's checks, money drafts, traveler's checks, wire transfers, etc.
55. Based upon all of the above, I believe that there is probable cause to conclude that Jason WEDDERBURN, Kayan KITSON and others committed the criminal offenses of Mail Fraud in violation of 18 U.S.C. § 1341, Money Laundering in violation of 18 U.S.C. § 1956, Conspiracy in violation of 18 U.S.C. § 371, and the Senior Citizens Against Marketing Scams Act of 1994 ("SCAMS Act") in violation of 18 U.S.C. § 2326. I respectfully request that complaints and arrest warrants be issued for JASON WEDDERBURN and KAYAN KITSON for the above-described offenses.

I declare that the foregoing is true and correct.



Cory P. McManus
Postal Inspector
US Postal Inspection Service

Attested to by the applicant in accordance with the requirements of Fed.
R. Crim. P. 4.1 by _____ Telephone _____

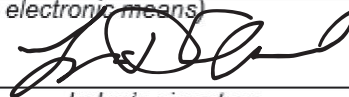
(specify reliable electronic means)

July 29, 2020

Date

Narragansett RI

City and State



Judge's signature

Lincoln D Almond USMJ

Printed name and title